

AO 91 (Rev. 08/09) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States District Court  
Southern District of Texas  
FILED

APR 13 2015

United States of America

v.

Carlos Augusto MEDINA YOB: 1977 United States

Case No. **M-15-0566-M**

David J. Bradley, Clerk

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 27, 2015 in the county of Hidalgo in the  
Southern District of Texas, the defendant(s) violated:

Code Section

Title 31 USC 5332

Offense Description

with the intent to evade a currency reporting requirement under Title 31 USC 5316, did knowingly conceal more than \$10,000.00 in currency or other monetary instruments, on the person of such individual or in any conveyance, article of luggage, merchandise, or other container and transports or transfers and/or attempts to transport or transfer such currency or monetary instruments from a place within the United States, to-wit: Hidalgo, Texas, to a place outside the United States, to-wit: the United Mexican States

This criminal complaint is based on these facts:

(SEE ATTACHMENT "A")

✓ Continued on the attached sheet.

Approved by: [Signature] A.B.  
Anti[Signature]

Complainant's signature

Antonio Perez IV, HSI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 4/13/20153:15 pm[Signature]

Judge's signature

City and state: McAllen, Texas

Peter Ormsby, U.S. Magistrate Judge

Printed name and title

On March 27, 2015, Homeland Security Investigations (HSI) Special Agent (SA) M. Kehoe conducted a primary outbound inspection operation at the Hidalgo/Reynosa International Bridge. While conducting these operations, SA M. Kehoe selected a black 2008 Honda Civic for inspection. The driver of the Honda Civic was identified as Jose Eduardo QUINTANILLA-Medina, a Mexican citizen. HSI SA A. Perez and R. Garza received a negative oral declaration for weapons, ammunition and monetary instruments in excess of \$10,000 from QUINTANILLA.

The vehicle was taken to the Customs and Border Protection (CBP) Vehicle and Cargo Inspection System (VACIS), a gamma-ray imaging system, CBP Officer H. Cervera, the VACIS technician, noticed an anomaly near the rear quarter panel of the vehicle. CBP K-9 Officer D. Rodriguez and his K-9, Betty, arrived at secondary to perform an inspection of the vehicle. CBPO D. Rodriguez informed HSI SA R. Garza that his K-9 Betty had alerted near the right rear taillight area of the vehicle. A further inspection resulted in the discovery of eight packages containing \$90,250.00 of U.S. currency behind the vehicle's right rear quarter panel. Assistant United States Attorney Steven Schammel accepted QUINTANILLA for federal prosecution.

On March 28, 2015, HSI McAllen conducted a consensual search of QUINTANILLA's Apple iPhone. During the search, HSI McAllen identified a series of text messages from a contact named Carlos MEDINA. HSI McAllen determined MEDINA was a co-conspirator in the aforementioned seizure.

On April 2, 2015, HSI McAllen SA A. Perez conducted an interview with MEDINA. Special Agent SA A. Perez read MEDINA his Miranda rights as witnessed by CBP Officer G. Martinez. MEDINA stated he understood his rights and voluntarily waived them in writing. MEDINA made the following non-verbatim statements that have been paraphrased and may not be in the order in which he gave them:

MEDINA admitted he gave QUINTANILLA the \$90,250.00 dollars in U.S. currency that had been seized by law enforcement. MEDINA gave QUINTANILLA the currency with the intent of having QUINTANILLA smuggle into Mexico. MEDINA stated he was expecting a payment of \$400.00 for coordinating the transportation of the U.S. currency from the United States into Mexico. MEDINA stated he had coordinated the transportation of currency on approximately five or six previous occasions.

HSI SA A. Perez provided MEDINA with several pictures displaying screen shots of a text message conversation discovered on QUINTANILLA's phone. MEDINA stated the text messages he was shown were from a conversation between QUINTANILLA and himself. MEDINA stated the text messages were in reference to the currency that had been seized from QUINTANILLA.